

**TECHNICAL REVIEW AND EVALUATION
OF APPLICATION FOR MUSKET CORPORATION
AIR QUALITY RENEWAL PERMIT NO. 71416**

I. INTRODUCTION

This Class II renewal permit is issued to Musket Corporation, the Permittee, for the continued operation of a bulk fuel transfer terminal located in Winslow, Arizona. This permit is a renewal of Permit No. 57895.

A. Company Information

1. Facility Name: Musket Corporation
2. Facility Location: 1620 Coopertown Road Winslow, AZ 86047
3. Mailing Address: P.O. Box 26210, Oklahoma City, OK 73126

B. Attainment Classification

This facility is located in an area that is in attainment for all criteria pollutants.

II. PROCESS DESCRIPTION

A. Process

The facility has three fuel storage tanks for storage of gasoline, crude oil, and diesel fuel, as well as a tanker loading facility and flare system for destruction of vapors during loading operations. The facility is designed to receive, store, and load 300,000,000 gallons of product per year, including 100,000,000 gallons of gasoline & crude oil (combined), and 200,000,000 gallons of diesel fuel. The facility receives products by railcar, each with a capacity of 27,500 gallons. Products are unloaded by 6 pumps at 300 gallons per minute each. The unloaded products are pumped to one of three storage tanks. Tank #1 is a 25,000 gallon tank with a closed vent system that is connected to a vapor combustion unit. Tank #2 is a 670,000 gallon tank equipped with an internal floating roof. Tank #3 is an 845,000 gallon tank with a fixed roof. Four pumps transfer product from the tanks to the trucks for delivery to offsite locations. Vapors displaced from truck loading are collected and piped to the vapor combustion unit. The facility is authorized to operate 24 hours per day, 365 days per year.

B. Air Pollution Control Devices

The facility utilizes a vapor combustion unit flare with a combustion efficiency of 98% to destroy the vapors that escape during the loading of gasoline into the trucks.

III. EMISSIONS

Table 1: Potential Emissions

Pollutant	Emissions (tons per year)
PM	0.20
PM ₁₀	0.20
PM _{2.5}	0.13
NO _x	1.95
CO	1.13
SO ₂	.0008
VOC	20.09
HAPs	1.72

IV. APPLICABLE REGULATIONS

Table 2 displays the applicable requirements for each permitted piece of equipment along with an explanation of why the requirement is applicable.

Table 2: Verification of Applicable Regulations

Unit	Control Device	Rule	Discussion
Gasoline/crude oil storage tanks (Tank #1 and Tank #2)	Internal Floating roof	40 CFR 60 Subpart Kb	This standard is applicable to storage tanks meeting the capacity and vapor pressure applicability requirements.
Gasoline distribution bulk terminal	Flare	40 CFR 63 Subpart BBBBBB 40 CFR 63.11(b) 40 CFR 63 Subpart A 40 CFR 60.502 and 60.503	This standard is applicable to existing bulk terminals (gasoline storage tanks, loading racks, and vapor collection-equipped gasoline cargo tanks).
Diesel storage tank (Tank #3); Flare system	N/A	A.A.C. R18-2-730	These requirements for unclassified sources are applicable to the diesel storage tank and flare system.

Unit	Control Device	Rule	Discussion
Fugitive dust sources	Water Trucks Dust Suppressants	A.A.C. R18-2 Article 6 A.A.C. R18-2-702	These standards are applicable to all fugitive dust sources at the facility.
Abrasive Blasting	Wet blasting; Dust collecting equipment; Other approved methods	A.A.C. R-18-2-702 A.A.C. R-18-2-726	These standards are applicable to any abrasive blasting operation.
Spray Painting	Enclosures	A.A.C. R18-2-702 A.A.C. R-18-2-727	This standard is applicable to any spray painting operation.
Demolition/renovation operations	N/A	A.A.C. R18-2-1101.A.8	This standard is applicable to any asbestos related demolition or renovation operations.

V. PREVIOUS PERMIT CONDITIONS

Permit No. 57895 was issued on November 7, 2013, for the continued operation of this facility. Table 3 below illustrates if a section in Permit No. 57895 was revised or deleted.

Table 3: Permit No. 71416

Section No.	Determination		Comments
	Revised	Delete	
Att. A.	X		General Provisions - Revised to represent most recent template language.
Att. B. Condition I	X		Facility-wide Requirements - Revised to represent most recent template language.
Att. B. Condition V	X		Fugitive Dust Requirements - Revised to represent most recent template language.
Att. B. Condition VII	X		Other Periodic Activities - Revised to represent most recent template language.

VI. MONITORING REQUIREMENTS

A. Facility Wide

At the frequency specified in this permit, the Permittee shall conduct an instantaneous survey of visible emissions from both process stack sources, when in operation, and fugitive dust sources.

B. Diesel Storage Tank And Loading Racks

1. Opacity

- a. The presence of a flare pilot flame for the flare shall be monitored using a thermocouple or an ultraviolet beam sensor.
- b. A certified EPA Reference Method 9 observer shall conduct a monthly survey of visible emissions emanating from the storage tank and the flare stack.

C. National Emission Standards For Hazardous Air Pollutants (NESHAPS) Requirements

1. Equipment Leak Inspections

The Permittee shall perform a monthly leak inspection of all equipment in gasoline service.

D. Fugitive Dust

1. The Permittee is required to keep record of the dates and types of dust control measures employed.
2. The Permittee is required to show compliance with the opacity standards by having a Method 9 certified observer perform monthly survey of visible emission from fugitive dust sources. The observer is required to conduct a 6-minute Method 9 observation if the results of the initial survey appear on an instantaneous basis to exceed the applicable standard.
3. The Permittee is required to keep records of the name of the observer, the time, date, and location of the observation and the results of all surveys and observations.
4. The Permittee is required to keep records of any corrective action taken to lower the opacity of any emission point and any excess emission reports.

E. Periodic Activities

1. The Permittee is required to record the date, duration and pollution control measures of any abrasive blasting project.
2. The Permittee is required to record the date, duration, quantity of paint used, any applicable MSDS, and pollution control measures of any spray painting project.
3. The Permittee is required to maintain records of all asbestos related demolition or renovation projects. The required records include the "NESHAP Notification for Renovation and Demolition Activities" form and all supporting documents.

VII. TESTING REQUIREMENTS

A. Gasoline/Crude Oil Storage Tank

1. Volatile Organic Compounds

July 10, 2018

The Permittee shall visually inspect the internal floating roof, the primary seal, and the secondary seal, prior to filling the storage vessel with volatile organic liquid (VOL). If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the owner or operator shall repair the items before filling the storage vessel. The Permittee shall perform visual inspection at least every 5 years as provided in Attachment “B” Condition II.C.3.b.

B. National Emission Standards For Hazardous Air Pollutants (NESHAPS) Requirements

1. Gasoline Loading Racks

The Permittee shall demonstrate that the flare is in compliance with the requirements in Attachment “B” Condition IV.B.3 and the associated vapor collection system is in compliance with the Attachment “B” Condition IV.D.1.

2. Gasoline Cargo Tanks

The annual certification test for gasoline cargo tanks shall consist of EPA Method 27, Appendix A–8, 40 CFR part 60.

VIII. LIST OF ABBREVIATIONS

A.A.C.	Arizona Administrative Code
CO	Carbon Monoxide
EPA	Environmental Protection Agency
HAP	Hazardous Air Pollutant
NO _x	Nitrogen Oxide
NESHAP	National Emission Standards for Hazardous Air Pollutants
PM	Particulate Matter
PM ₁₀	Particulate Matter Nominally less than 10 Micrometers
PTE	Potential-to-Emit
SO ₂	Sulfur Dioxide
TPY	Tons per Year
VOC	Volatile Organic Compound
yr	Year